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October 1, 2020

VIA ECF

Hon. Lorna G. Schofield
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Abbott Laboratories v. Carol Feinberg, Case No. 18 Civ. 8468 (LGS)

Dear Judge Schofield,

We write on behalf of Plaintiff Abbott Laboratories ("Abbott") with Defendants' consent under Section I.D.3 of the Court's Individual Rules and Procedures for Civil Cases to respectfully request the Court's permission to file the Joint Final Pretrial Order in redacted form and under seal. These redactions are narrowly tailored to maintain confidentiality of the identity of various artworks, including the Painting at issue in this action.

This Court previously allowed such redactions because they were "narrowly tailored to prevent the disclosure of information that could impair the value of the artwork at issue as well as other artworks." (Sept. 28, 2020 Order, Dkt. No. 134; *see* March 2, 2020, Order, Dkt. No. 108; August 28, 2019, Order, Dkt. No. 72; August 21, 2019, Order, Dkt. No. 70.) For these same reasons, Abbott again seeks the Court's permission to redact the identity of the Painting, as well as several other artworks.

Respectfully submitted,

Judd B. Grossman

cc: All Counsel (via ECF)

The application is GRANTED. The parties may file their Joint Final Pretrial Order in redacted form and under seal. The Court has reviewed the materials, and the proposed redactions are narrowly tailored to prevent the disclosure of information that could impair the value of the artwork at issue, as well as other artworks. *See, e.g., CSL Silicones, Inc. v. Midsun Grp. Inc.*, No. 14 Civ. 1897, 2017 WL 4750701, at *4 (D. Conn. July 12, 2017) (allowing for redactions of "commercially sensitive" information).

SO ORDERED

Dated: October 2, 2020
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE